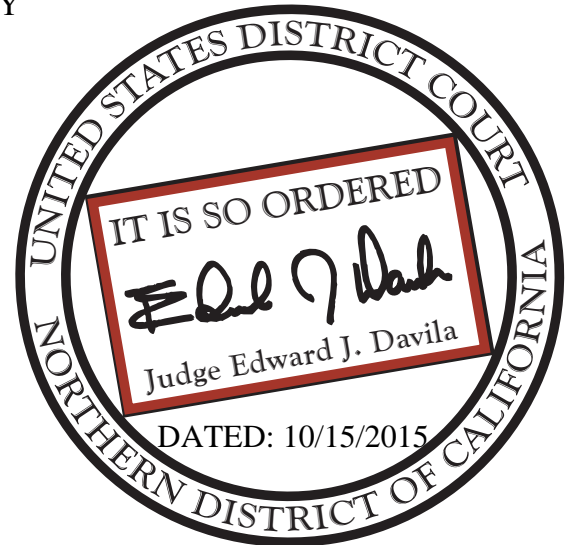


1 C. ANDREW KITCHEN (SBN 292609)  
dkitchen@maynardcooper.com  
2 ALEXANDRA V. DRURY (SBN 291920)  
adrury@maynardcooper.com  
3 MAYNARD, COOPER, & GALE, LLP  
275 Battery Street, Suite 1350  
San Francisco, CA 94111  
4 Telephone: (415) 591-8371  
Facsimile: (205) 254-1999

5 Attorneys for Defendant  
6 METROPOLITAN LIFE INSURANCE COMPANY

7 GLENN KANTOR (SBN 122643)  
gkantor@kantorlaw.net  
8 BETH A. DAVIS (SBN 277560)  
bdavis@kantorlaw.net  
9 ANDREW KANTOR (SBN 303093)  
akantor@kantorlaw.net  
KANTOR & KANTOR, LLP  
10 19839 Nordhoff Street  
Northridge, CA 91324  
Telephone: (818) 886-2525  
11 Facsimile: (818) 350-6272

12 Attorneys for Plaintiff  
13 NIA MUJADADI-TURAN



14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 NIA MUJADADI-TURAN

17 Plaintiff,

18 vs.

19 MOTOROLA MOBILITY, LLC;  
METROPOLITAN LIFE INSURANCE  
COMPANY

20 Defendants.  
21  
22  
23  
24  
25

) Case No.: 05:15-cv-2752-EJD  
)  
)

) **Hon. Edward J. Davila**  
)  
)

) **JOINT STIPULATION TO CONTINUE**  
) **DEADLINE FOR METLIFE TO**  
) **RESPOND TO PLAINTIFF'S**  
) **COMPLAINT**

) Complaint Filed: June 18, 2015

) Trial Date: TBD  
)  
)

**JOINT STIPULATION**

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and Defendant Metropolitan Life Insurance Company (“MetLife”), hereby jointly stipulate to an extension of time for MetLife to respond to Plaintiff’s Complaint. The Parties agree and stipulate that MetLife will respond to Plaintiff’s Complaint on or before November 10, 2015. In support of this Stipulation, the Parties agree and stipulate as follows:

1. On June 18, 2015, Plaintiff initiated the present action against MetLife in the United States District Court for the Northern District of California. (*See* ECF Doc. No. 1).

2. MetLife was served with the Summons and Complaint in this action on June 26, 2015.

3. The parties submitted stipulations extending the deadline for MetLife to respond to the Complaint to facilitate on-going settlement discussions. (*See* ECF Doc. Nos. 11, 14 and 20).

4. The Parties have agreed to an additional thirty (30) day extension of time for MetLife to respond to Plaintiff’s Complaint. Accordingly, based on the stipulation, MetLife’s response to Plaintiff’s Complaint is due on or before November 10, 2015.

5. The Parties are optimistic that a resolution can be reached in this matter, and the additional time will afford the Parties the opportunity to explore settlement opportunities without incurring additional costs of litigation. This Stipulation will not alter the date of any event or deadline already fixed by Court order. Therefore, the Parties stipulate and agree to extend MetLife’s deadline to respond to Plaintiff’s Complaint until November 10, 2015.

1 Date: October 9, 2015

MAYNARD, COOPER, & GALE, LLP

2 By: /s/ C. Andrew Kitchen  
3 C. Andrew Kitchen  
4 Attorneys for Defendant  
5 METROPOLITAN LIFE INSURANCE  
6 COMPANY

7 Date: October 9, 2015

KANTOR & KANTOR LLP

8 By: /s/ Beth A. Davis  
9 BETH A. DAVIS  
10 Attorneys for Plaintiff  
11 NIA MUJADADI-TURAN  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24

**CERTIFICATE OF SERVICE**

I am employed in the County of San Francisco State of California. I am over the age of eighteen years and not a party to this action. My business address is 275 Battery Street, Suite 1350, San Francisco, CA 94111. On September 10, 2015, I served a copy of the following documents:

**JOINT STIPULATION TO CONTINUE DEADLINE FOR METLIFE TO RESPOND TO PLAINTIFF'S COMPLAINT**

☒ By CM/ECF ELECTRONIC SERVICE: The following are registered CM/ECF users with the Court, and have consented to service through the Court's automatic transmission of a notice of electronic filing.

GLENN KANTOR (SBN 122643)  
gkantor@kantorlaw.net  
BETH A. DAVIS (SBN 277560)  
bdavis@kantorlaw.net  
ANDREW KANTOR (SBN 303093)  
akantor@kantorlaw.net  
KANTOR & KANTOR, LLP  
19839 Nordhoff Street  
Northridge, CA 91324  
Telephone: (818) 886-2525  
Facsimile: (818) 350-6272

Attorneys for Plaintiff NIA MUJADADI-TURAN

Benjamin A. Emmert  
bemmert@littler.com  
LITTLER MENDELSON  
50 West San Fernando Street, 15th Floor  
San Jose, CA 95113-2431  
Telephone: (408) 998-4150  
Facsimile: (408) 288-5686

Attorneys for Defendant MOTOROLA MOBILITY, LLC

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on October 9, 2015, at San Francisco, California.

\_\_\_\_\_  
Mila Dunn